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Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

K.B., and R.C.,

Plaintiffs,

vs.

PROVIDENCE HEALTH PLAN,

Defendant.

**STIPULATED MOTION TO SET
DEADLINE TO RESPOND TO
COMPLAINT**

Case No. 4:20-cv-00123-DN-PK

Judge David Nuffer

Magistrate Judge Paul Kohler

Defendant Providence Health Plan and Plaintiffs, by and through their counsel of record in this matter, hereby stipulate and move the Court to set February 11, 2021 as the deadline for Defendant to answer or otherwise respond to the Complaint (Document 2) in this matter.

Good cause exists for the requested deadline because (1) Defendant anticipates filing a motion to dismiss for lack of personal jurisdiction; (2) Defendant needs additional time to gather information in connection with said motion to dismiss; and (3) scheduling conflicts have created the need for the requested deadline. The requested extension is timely because Defendant did not

sign and return a waiver of the service of summons, and the deadline to answer or otherwise respond to the Complaint has not expired.

A copy of the proposed Order Setting Deadline to Respond to Complaint is attached as Exhibit "A."

Dated this 8th day of January, 2021.

PARR BROWN GEE & LOVELESS

By: /s/ Bentley J. Tolk
Bentley J. Tolk

Attorneys for Defendant

BRIAN S. KING, PC

By: /s/ Brian S. King
Brian S. King
Brent J. Newton
Samuel M. Hall

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of January, 2021, a true and correct copy of the foregoing **STIPULATED MOTION TO SET DEADLINE TO RESPOND TO COMPLAINT** was served via electronic service on the following:

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